LaJuana S. Wilcher Secretary

AIR QUALITY PERMIT

Issued under 401 KAR 52:020

Ernie Fletcher Governor



Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

Permittee Name: Swedish Match

Mailing Address: 1121 Industrial Drive, Owensboro, KY 42302

is authorized to operate a tobacco manufacturing facility

Source Name: Swedish Match

Mailing Address: 1121 Industrial Drive, Owensboro, KY 42302 Source Location: 1121 Industrial Drive, Owensboro, KY 42302

AI Number: 963

Permit Number: V-04-026 Permit Type: Title V/Operating

Regional Office: Owensboro Completion Date: August 17, 2001

3032 Alvey Park Drive W., Ste 700 Issuance Date: November 4, 2004 Owensboro, KY 42303-2191 Expiration Date: November 4, 2009

(270) 687-7304

John S. Lyons, Director Division for Air Quality

DEP7001 (6-97) *Revised: 07/10/03*

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

AIOO963 (Source) General Requirements:

Page 1 of 35

Submittal/Action Requirements:

No. Condition

Condition

S-1 SEMIANNUAL REPORTS:

The permittee shall submit report(s): Due semiannually, by the 30th of January and July to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. This report shall be a summary of any monitoring required by this permit, other than continuous emission or opacity monitors. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1b (V)1]. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official [401 KAR 52:020, Section 23]. Data from all continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of 401 KAR 59:005, Section 3(3). [401 KAR 52:020 Section 26, 401 KAR 59:005 Section 3(3)]

S-2 EMISSION EXCEEDANCES:

The owner or operator shall submit report(s): Due within thirty (30) days of emission related excedances from permit requirements, including those attributed to upset conditions (other than emission exceedances covered by Requirement D.5); to the Regional Office listed on the front of this permit. Other deviations from permit requirements shall be included in the semiannual reports required by Condition No S-1. [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1b V(3) and (4)]. [401 KAR 52:020 Section 26]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Submittal/Action Requirements:

No.	Condition
Condition	

S-3 COMPLIANCE CERTIFICATION:

The permittee shall certify compliance with the terms and conditions contained in this permit and shall submit compliance certification: Due annually, by the 30th of January to the Regional Office listed on the front of this permit. Compliance Certification Form (DEP 7007CC) (or an approved alternative) shall be used in accordance with the following requirements:

- a. Identification of each term or condition;
- b. The compliance status regarding each term or condition of the permit;
- c. Whether compliance was continuous or intermittent; and
- d. The method used for determining the compliance status for the source, currently and over the reporting period.
- e. For an emissions unit that was still under construction or which has not commenced operation at the end of the year covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the Regional Office listed on the front of this permit and the following addresses:

U.S. EPA Region IV Air Enforcement Branch Atlanta Federal Center 61 Forsyth St. Atlanta, GA 30303-8960

Division for Air Quality Central Files 803 Schenkel Lane Frankfort, KY 40601. [401 KAR 52:020 Section 21]

S-4 PERFORMANCE TEST REPORT:

For any performance test(s) required by this permit, the permittee shall submit performance/emission test results: Due within 45 days of the completion of the fieldwork to the Division [Policy Manual of the Division of Air Quality, Section VII.3]. [401 KAR 50:016 Section 1(1)]

Page 2 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 3 of 35

Submittal/Action Requirements:

Condition No.	Condition
S-5	PERMIT EXPIRATION AND REAPPLICATION REQUIREMENTS:
	This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate. The permittee shall submit permit application for renewal: Due at least 180 days prior to permit expiration to the Division. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:020 Section 12] The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets. [401 KAR 52:020 Section 8(2)]

Narrative Requirements:

Condition			
No.	Condition		
T-1	SECTION A. PERMIT AUTHORIZATION. [401 KAR 52:020]		
T-2	A1. Pursuant to a duly submitted application, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulation promulgated pursuant thereto.		
	The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and received a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.		
	Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency. [401 KAR 52:020]		
T-3	SECTION B. SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS. [401 KAR 52:020]		
T-4	B1. Compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1b]. [401 KAR 52:020 Section 26]		

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition No.	Condition
T-5	B2. Sulfur dioxide (SO2) and particulate matter (PT) emissions, as measured by methods referenced in 401 KAR 50:015 Section 1, shall not exceed the respective limitations specified herein. [401 KAR Chapter 52]
T-6	SECTION C. SOURCE CONTROL EQUIPMENT REQUIREMENTS. [401 KAR 50:055]
T-7	C1. At all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [401 KAR 50:055 Section 2(5)]
T-8	SECTION D. MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS. [401 KAR 52:020]
T-9	D.1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include: a. Date, place as defined in this permit, and time of sampling or measurements. b. Analyses performance dates; c. Company or entity that performed analyses; d. Analytical techniques or methods used; e. Analyses results; and f. Operating conditions during time of sampling or measurement [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1b (IV)(1)]. [401 KAR 52:020 Section 26]
T-10	D.2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Cabinet Provisions and Procedures for Issuing Title V Permits, Sections 1b (IV)(2) and 1a (8)]. [401 KAR 52:020 Section 26]
T-11	 D.3. The permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times: a. To access and copy any records required by the permit; b. To inspect any facility, equipment (including monitoring and air pollution control equipment), practice, or operation; and c. To sample or monitor substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times are defined as during all hours of operation, during normal office hours, or during an emergency. [401 KAR 52:020 Section 3(1)(h)]

Page 4 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition No.	Condition
T-12	D.4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Pursuant to 401 KAR 50:060, Section 2(2), refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties. [KRS 77.165, 401 KAR 50:060 Section 2(2)]
T-13	D.5. The owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows: i) When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown. ii) When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request. [401 KAR 50:055 Section 1]
T-14	D.6. The permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee. If a KEIS emission report is not mailed to the permittee, comply with all other emission reporting requirements in this permit. [401 KAR 52:020 Section 3(1)(d)]
T-15	SECTION E. GENERAL PROVISIONS. [401 KAR 52:020]
T-16	E(a) General Compliance Requirements. [401 KAR 52:020]
T-17	E(a)1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including termination, revocation and reissuance, revision or denial of a permit [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (3)]. [401 KAR 52:020 Section 26]
T-18	E(a)2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (6)]. [401 KAR 52:020 Section 26]

Page 5 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition No.	Condition	
T-19	E(a)3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will reopened for cause and revised accordingly under the following circumstances: a. If additional requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the application requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12; b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements; c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; d. If any additional applicable requirements of the Acid Rain Program become applicable to the source. [Acid Rain sources only] Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorte time period in the case of an emergency. [401 KAR 52:020 Section 19]	
T-20	E(a)4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (7) and (8)]. [401 KAR 52:020 Section 26]	
T-21	E(a)5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority. [401 KAR 52:020 Section 7(1)]	
T-22	E(a)6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (14)]. [401 KAR 52:020 Section 26]	
T-23	E(a)7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (4)]. [401 KAR 52:020 Section 26]	
T-24	E(a)8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (15)(b)]. [401 KAR 52:020 Section 26]	
T-25	E(a)9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3 (6) [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (10)]. [401 KAR 52:020 Section 26]	

Page 6 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition No.	n Condition			
T-26	E(a)10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 52:020 Section 11(3)(b)]			
T-27	E(a)11. This permit does not convey property rights or exclusive privileges. [Cabinet Provisions and Procedures for Issuing Title V Permits, Section 1a (9)]. [401 KAR 52:020 Section 26]			
T-28	E(a)12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency. [401 KAR Chapter 52]			
T-29	E(a)13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 52:020 Section 11(3)(d)]			
T-30	E(a)14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 52:020 Section 11(3)(a)]			
T-31	E(a)15. Permit shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with: (a) Applicable requirements that are included and specifically identified in the permit and (b) Non-applicable requirements expressly identified in this permit. [401 KAR 52:020 Section 11]			
T-32	E(a)16. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source. [401 KAR Chapter 51]			
T-33	E(b) Permit Revisions. [401 KAR 52:020]			
T-34	E(b)1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2). [401 KAR 52:020 Section 14(2)]			
T-35	E(b)2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer. [401 KAR 52:020]			
T-36	E(d) Acid Rain Program Requirements. [401 KAR Chapter 52]			

Page 7 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition	
No.	Condition
T-37	E(d)1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable. [401 KAR Chapter 52]
T-38	E(e) Emergency Provisions. [401 KAR 52:020]
T-39	E(e)1. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that: a. An emergency occurred and the permittee can identify the cause of the emergency; b. The permitted facility was at the time being properly operated; c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations are exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken. e. This requirement does not relieve the source from other local, state or federal notification requirements. [401 KAR 52:020 Section 24(1)]
T-40	E(e)2. Emergency conditions listed in General Condition E(f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement. [401 KAR 52:020 Section 24(3)]
T-41	E(e)3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:020 Section 24(2)]
T-42	E(f) Risk Management Provisions. [401 KAR Chapter 68]
T-43	E(f)1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to
	RMP Reporting Center P.O. Box 3346 Merrifield, VA, 22116-3346. [401 KAR Chapter 68]
T-44	E(f)2. If requested, submit additional relevant information to the Division or the U.S. EPA. [401 KAR Chapter 68]

Page 8 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Narrative Requirements:

Condition No.	Condition
T-45	E(g) Ozone depleting substances. [40 CFR 82]
T-46	E(g)1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B: a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156. b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158. c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161. d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166 e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156. f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [40 CFR 82]
T-47	E(g)2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. [40 CFR 82]

Page 9 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 10 of 35

COMB1 (Emission Unit 001) 3 Indirect Heat Exchangers (70.64mm/Btu ea) Primary fuel: Nat. Gas

Condition No.	Parameter	Condition
	1 drameter	Condition
L-1	SO2 (Sulfur Dioxide)	The unit shall have emissions of SO2 (Sulfur Dioxide) <= 4.08 lb/mm Btu actual heat input.
		Compliance Demonstration Compliance with the allowable sulfur dioxide standard by calculating emissions using the following formulas: when combusting natural gas: [(most current emission factor from AP-42) divided by (natural gas heating value in Btu/feet3=1,000)] x 1,000,000 Btu/mmBtu; OR when combusting No. 2 fuel oil; [(most current emission factor from AP-42) divided by (#2 fuel oil heating value in Btu/gallon=140,00)] x 1,000,000 Btu/mmBtu.
		Regulation Citation. [401 KAR 61:015 Section 5(1)] This requirement is applicable during the following months: All Year. Statistical basis: 24-hour average.
L-2	PT (Particulate Matter)	The unit shall have emissions of PT (Particulate Matter) <= .272 lb/mm Btu actual heat input.
		Compliance Demonstration Compliance with the allowable particulate standard by calculating emissions using the following formulas: when combusting natural gas: [most current emission factor from AP-42) divided by (natural gas heating value in BtuU/cubic feet=1,000)] x 1,000,000 Btu/mmBtu; OR when combusting No. 2 fuel oil; [most current emission factor fromAP-42) divided by (#2 fuel oil heating value in Btu/gallon)] x 1,000,000Btu/mmBtu. [401 KAR 61:015 Section 4(1)] This requirement is applicable during the following months: All Year. Statistical basis: Three-hour average.
L-3	Visible Emissions	The unit shall have Visible Emissions <= 20 % opacity unless otherwise allowed in this permit. [401 KAR 61:015 Section 4(2)] This requirement is applicable during the following months: All Year. Statistical basis: Six-minute average.

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 11 of 35

3.6	-	•
Monitorin	or Reali	iramanta:
MICHITUTI	ig ixcuu	members.
	0 - 1 -	

	Womtoring Requirements.			
Condition No.	Parameter	Condition		
M-1	Fuel Oil No. 2	The heat value and sulfur content of Fuel Oil No. 2 monitored by fuel supplier certification for each shipment shall be determined. This requirement is applicable during the following months: All Year. Statistical basis: Approved basis.		
M-2	fuel	The amount of each combusted fuel monitored by approved method(s) weekly shall be determined for the unit. [401 KAR 61:015 Section 5] This requirement is applicable during the following months: All Year. Statistical basis: Instantaneous determination.		
Narrativo	e Requirements:			
Applic	cable Regulations:			
Condition No.	Condition			
T-1	Applicable Regulations: Existing Indirect Heat Exchangers applies to existing affected facilities less than 250 mmBtu/hr commenced before April 9, 1972. [401 KAR 61:015]			
A 1 104	1.7.			

Additional Limitations:

Condition No.	Condition
T-2	Additional Limitations: There is no limit to visible emissions opacity while building a new fire provided a manufacturer recommended method is used and the manufacturer recommended time frame for bringing the boiler up to operating conditions is not exceeded. [401 KAR 61:015 Section 4(2)(c)]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 12 of 35

EQPT1 (Emission Unit 002) Wolverine Jetzone Dryer Control equipment: cyclone

Condition	1	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 9.6 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(daily hours of operation in hrs/day)]x(emission factor of 7lb PT/ton)x(1-control efficiency of 0.80).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	licable Regulations:	
Condition	1	
No.	Condition	
T-1	Applicable Regulations: Ne particulate emissions. [401	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 13 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading which exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 14 of 35

EQPT4 (Emission Unit 005) Griffin Dryer Control equipment: Torit cartridge filter dust collector

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 3.1 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(hours of operation in hrs/day)]x(emission factor of 20 lb PT/ton)(1-control efficiency of 0.99).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	e Requirements:	
Applio	cable Regulations:	
Condition		
No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401 F	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 15 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 16 of 35

EQPT5 (Emission Unit 006) Wolverine Belt Dryers 1 & 2 Control equipment: cyclone

Condition	1	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 9.5 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demostrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= $[(daily processing rate in tons/day)/(daily hours of operation in hrs/day)]x(emission factor of 2 lb PT/ton)x(1-control efficiency of 0.80).$
		See Monitoring Requirements for monitoring rates and visual injection controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	licable Regulations:	
Condition	1	
No.	Condition	
T-1	Applicable Regulations: Ne particulate emissions. [401 I	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 17 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 18 of 35

EQPT6 (Emission Unit 007) Powder Dressing Preparation & Application Equipment includes: ribbon blender, storage hopper

Condition	l	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 6.1 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.58 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.67 power, and multiplying by 4.10 (maximum = 4.10 x process weight rate $^{0.67}$).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(hours of operation in hrs/day)]x(emission factor of 2lb PT/ton).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 61:020 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 40 % opacity. [401 KAR 61:020 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	icable Regulations:	
Condition	l	
No.	Condition	
T-1	Applicable Regulations: Exilimits particulate emissions.	sting process operations is applicable to each affected facility associated with a process operation commenced before July 2, 1975 and [401 KAR 61:020]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 19 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 20 of 35

EQPT7 (Emission Unit 008-A) No. 1 ordering cylinder Maximum tobacco processing rate: 8800 lbs/hr

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) <= 10.7 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.58 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.67 power, and multiplying by 4.10 (maximum = 4.10 x process weight rate^0.67).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= (daily processing rate in tons/day)/(hours of operation in hrs/day)x(emission factor of 1.9lb PT/ton).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 61:020 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 40 % opacity. [401 KAR 61:020 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	e Requirements:	
Applicable Regulations:		
Condition		
No.	Condition	
T-1	Applicable Regulations: Exilimits particulate emissions.	sting process operations is applicable to each affected facility associated with a process operation commenced before July 2, 1975 and [401 KAR 61:020]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 21 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]
N.F. *4	

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor and keep records of the amount of material processed on a weekly basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 22 of 35

EQPT8 (Emission Unit 009-A) Stemmery Equipment includes: Stemming line A

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) <= 6.7 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.58 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.67 power, and multiplying by 4.10 (maximum = 4.10 x process weight rate^0.67).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)(hours of operation in hrs/day)]x(emission factor of 23.3 lb PT/ton)x(1-control efficiency of 0.99).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 61:020 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 40 % opacity. [401 KAR 61:020 Section 3(1)] Statistical basis: Six-minute average.
Narrative	e Requirements:	
Applicable Regulations:		
Condition		
No.	Condition	
T-1	Applicable Regulations: Exilimits particulate emissions.	sting process operations is applicable to each affected facility associated with a process operation commenced before July 2, 1975 and [401 KAR 61:020]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 23 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor of the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

EQPT9 (Emission Unit 011) Strip Line Cylinder Maximum tobacco processing rate: 4000 lbs/hr

Limitation Requirements:

Condition	<u> </u>	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 5.5 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(hours of operation in hrs/day)]x(emission factor of 2lb PT/ton).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	e Requirements:	
Applio	cable Regulations:	
Condition No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401 B	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Page 24 of 35

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 25 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 26 of 35

EQPT10 (Emission Unit 010) Carmen Dryer Control equipment: dust collector

Condition	1	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 9.0 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(daily hours of operation in hrs/day)]x(emission factor of 20lb PT/ton)(1-control efficiency of 0.99).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	icable Regulations:	
Condition	1	
No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401]	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 27 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 28 of 35

EQPT12 (Emission Unit 008-B) No. 2 ordering cylinder Maximum tobacco processing rate: 8800 lbs/hr

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 8.7 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{0.62}$).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= (daily processing rate in tons/day)/(hours of operation in hrs/day)x(emission factor of 1.9lb PT/ton).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	e Requirements:	
Appli	cable Regulations:	
Condition		
No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401 F	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 29 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 30 of 35

EQPT13 (Emission Unit 009-B) Stemmery Equipment includes: Stemming line B

Condition	l	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) <= 5.7 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate^0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(hours of operation in hrs/day)]x(emission factor of 23.3lb PT/ton)x(1-control efficiency of 0.99).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	icable Regulations:	
Condition	<u> </u>	
No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401 B	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 31 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 32 of 35

EQPT14 (Emission Unit 009-C) Stemmery Equipment includes: Strip line

Condition	l	
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 5.5 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate $^{\circ}$ 0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(hours of operation in hrs/day)]x(emission factor of 22.2 lb PT/ton)x(1-control efficiency of 0.99).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
Narrativ	ve Requirements:	
Appl	icable Regulations:	
Condition	1	
No.	Condition	
T-1	Applicable Regulations: New particulate emissions. [401]	w process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits KAR 59:010]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 33 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 34 of 35

GACT1 (EQPT002 & EQPT003) Two Proctor Apron Dryers Emission Units 3 & 4:

Condition			
No.	Parameter	Condition	
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) \leq 10.1 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.58 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.67 power, and multiplying by 4.10 (maximum = 4.10 x process weight rate $^{\circ}$ 0.67).	
		Compliance Demonstration	
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= [(daily processing rate in tons/day)/(daily hours of operation in hrs/day)]x (emission factor of 2 lb PT/ton).	
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 61:020 Section 3(2)] Statistical basis: Three-hour average.	
L-2	Visible Emissions	Each unit shall have Visible Emissions < 40 % opacity. [401 KAR 61:020 Section 3(1)] Statistical basis: Six-minute average.	
Narrativo	e Requirements:		
Applio	Applicable Regulations:		
Condition			
No.	Condition		
T-1	Applicable Regulations: Existi limits particulate emissions. [4	ng process operations is applicable to each affected facility associated with a process operation commenced before July 2, 1975 and 01 KAR 61:020]	

Swedish Match N America Inc Facility Requirements

Activity ID No.: APE20040001

Page 35 of 35

Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) daily hours of operation and material processing rate; 2) the weekly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading wich exceeded the standard. [401 KAR Chapter 52 Section 10]

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a daily basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a daily basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a weekly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Swedish Match N America Inc Subject Item Inventory

Activity ID No.: APE20040001

Subject Item Inventory:

ID	Designation	Description
AIOO963	Source	General Requirements
COMB1	Emission Unit 001	3 Indirect Heat Exchangers (70.64mm/Btu ea) Primary fuel: Nat. Gas Secondary fuel: #2 Oil Constructed commenced: 1971
EQPT1	Emission Unit 002	Wolverine Jetzone Dryer Control equipment: cyclone Maximum tobacco processing rate: 12,000 lbs/hr Construction Commenced: 1982
EQPT2	Emission Unit 003	Proctor Dryer #1 Maxumum tobacco processing rate: 9000 lbs/hr Construction commenced: 1972
EQPT3	Emission Unit 004	Proctor Dryer #2 Maximum tobacco processing rate: 9000 lbs/hr Construction commenced: 1973
EQPT4	Emission Unit 005	Griffin Dryer Control equipment: Torit cartridge filter dust collector Maximum tobacco processing rate: 3000 lbs/hr Construction commenced: 1991
EQPT5	Emission Unit 006	Wolverine Belt Dryers 1 & 2 Control equipment: cyclone Maximium tobacco processing rate: 20000 lbs/hr Construction commenced: 1977
EQPT6	Emission Unit 007	Powder Dressing Preperation & Application Equipment includes: ribbon blender, storage hopper Control equipment: fabric filter Maximum powder processing rate: 7200 lbs/hr Construction commenced: 1973
EQPT7	Emission Unit 008-A	No. 1 ordering cylinder Maximum tobacco processing rate: 8800 lbs/hr Construction commenced: 1972

Swedish Match N America Inc Subject Item Inventory

Activity ID No.: APE20040001

ID	Designation	Description
EQPT8	Emission Unit 009-A	Stemmery Equipment includes: Stemming line A Control equipment: two dust collector Maximum tobacco processing rate for lines A : 4200 lbs/hr Construction commenced: A, 1972
EQPT9	Emission Unit 011	Strip Line Cylinder Maximum tobacco processing rate: 4000 lbs/hr Construction commenced: 1995
EQPT10	Emission Unit 010	Carmen Dryer Control equipment: dust collector Maximum tobacco processing rate: 9000 lbs/hr Construction commenced: 1979
EQPT12	Emission Unit 008-B	No. 2 ordering cylinder Maximum tobacco processing rate: 8800 lbs/hr Construction commenced: 1987
EQPT13	Emission Unit 009-B	Stemmery Equipment includes: Stemming line B Control equipment: two dust collector Maximum tobacco processing rate for lines B: 4200 lbs/hr Construction commenced:B, 1980
EQPT14	Emission Unit 009-C	Stemmery Equipment includes: Strip line Control equipment: two dust collectors Maximum tobacco processing rate for strip line: 4200 lbs/hr Construction commenced: strip line, 1995
EQPT15	Insignificant Activity 1	Nat. gas burner on U2 Wolverine Jetzone Dryer, 2.5mmBtu/hr
EQPT16	Insignificant Activity 2	Lab fume hoods in R&D Lab
EQPT17	Insignificant Activity 3	Machining of metals
EQPT18	Insignificant Activity 4	Solvent degreaser, 17 gallon
EQPT19	Insignificant Activity 5	6000 gallon UST-outside building east side - denatured alcohol
EQPT20	Insignificant Activity 6	6000 gallon UST-outside building east side - empty

Swedish Match N America Inc Subject Item Inventory

Activity ID No.: APE20040001

ID	Designation	Description
EQPT21	Insignificant Activity 7	30000 gallon AST-outside building east side #2 fuel oil
EQPT22	Insignificant Activity 8	30000 gallon AST-outside building east side #2 fuel oil
EQPT23	Insignificant Activity 9	Three 5000 gallon & ten 10000 gallon tanks of molasses, liquid sugar and other food additives - back isle
EQPT24	Insignificant Activity 10	Multiple 5 to 55 gallon containers molasses, liquid sugar & food additives - Kitchen
EQPT25	Insignificant Activity 11	Multiple 55 gallon drums of oil, lubricants & grease - Oil Shed
EQPT26	Insignificant Activity 12	Multiple 55 gallon drums water treatment chemicals - Boiler Room
EQPT27	Insignificant Activity 13	Compressed gas cylinders for nitrogen, argon, oxygen, helium and acetylene - plantwide
EQPT28	Insignificant Activity 14	Cart Washer 0.375 mmBtu/hr
EQPT29	Insignificant Activity 15	R&D Cooker (steam)
EQPT30	Insignificant Activity 16	Snuff Cooker (steam)
EQPT31	Insignificant Activity 17	Snuff Room Ribbon Blenders
EQPT32	Insignificant Activity 18	Welding Booth
EQPT33	Insignificant Activity 19	Vacuum Cleaning System (Stemmery)
EQPT34	Insignificant Activity 20	Flavor Cylinders (multiple)
EQPT35	Insignificant Activity 21	Vacuum Chambers (2)
EQPT36	Insignificant Activity 22	Exalt Portion Pack Machine (vents indoors)
EQPT37	Insignificant Activity 23	Renegate Portion Pack Machine (vents indoors)

Subject Item Groups:

ID	Description	Components
GACT1	1 2	EQPT3 Proctor Dryer #2
		Maximum tobacco processing rate: 9000 lbs/hr
		Construction commenced: 1973

Swedish Match N America Inc Subject Item Inventory

Activity ID No.: APE20040001

ID	Description	Components
GACT1	1 2	EQPT2 Proctor Dryer #1 Maxumum tobacco processing rate: 9000 lbs/hr
		Construction commenced: 1972

<u>KEY</u>	
ACTV = Activity	AIOO = Agency Interest
AREA = Area	COMB = Combustion
EQPT = Equipment	MNPT = Monitoring Point
PERS = Personnel	PORT = Transport
STOR = Storage	STRC = Structure
TRMT = Treatment	